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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of

The Development of Operational,
Technical and Spectrum Requirements
for Meeting Federal, State, and
Local Public Safety Agency
Communications Requirements Through
The Year 2010.

WT Docket No. 96-86

To: The Commission

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COMMENTS OF AMERITECH MOBILE SERVICES, INC.

Ameritech Mobile Services, Inc. (Ameritech) hereby submits its comments in response to the Commission's Notice of Proposed Rule Making (NPRM) in the above captioned proceeding. Ameritech applauds the Commission's proposal to proactively plan for spectrum requirements of public safety entities. These entities should be given priority in determining how to allocate the spectrum which has been reassigned from Government use, as well as future allocations. However, a reallocation of the VHF frequencies assigned under Part 22 would not serve the public interest.

The NPRM states (at Paragraph 75) that "there are other bands which may be suitable for public safety communications," and goes on to suggest that "VHF channels presently allocated for the Public Mobile Service may be lightly used or even unused in

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some regions." Id. The NPRM conjectures that "[w]e believe that the light use of frequencies may result from the discontinuance of service by commercial providers who are intended users of that spectrum." Id. [footnote omitted].

The channels on which the Commission has focused were originally allocated for the provision of improved mobile telephone service (IMTS). It is true that these channels are no longer heavily used for IMTS, since cellular has largely supplanted such two-way use. However, it is no longer true that these channels are lightly used, since most are now used to provide paging service. As the Commission recognized in its Notice of Proposed Rule Making in WT Docket No. 96-18, virtually all frequencies are now heavily licensed, especially the common carrier VHF and UHF paging channels in the 152 and 454 MHz bands, which "appear to be more heavily licensed than the 931 [paging] channels." Id., 11 FCC Rcd 3108, 3112 (1996). Ameritech currently provides paging services on a number of the paired VHF frequencies, and is in the middle of an ambitious expansion of its systems.

In this regard, the industry has followed precisely the course set by the Commission in CC Docket No. 87-120, wherein the Commission recognized that there was a pressing need for more paging channels, and for control frequencies used to link wide-area paging base stations. See Flexible Allocation of

Frequencies in the Domestic Public Land Mobile Service for Paging and Other Services, First Report and Order, 4 FCC Rcd 1576

(1989). The Commission's licensing records reflect that the industry has invested substantial resources in the licensing and construction of facilities on these channels during the intervening nine years. The resulting base stations and control operations have made possible the provision of valuable paging services to the public safety community, as well as doctors, nurses, and others concerned with the protection of life and property. It would be both inequitable and adverse to the public interest to jeopardize these operations through a reallocation.

While VHF channels may be less heavily used in rural areas, there is less need for public safety channels in such areas, as well. Moreover, these VHF channels serve a valuable role in providing two-way communication links to rural residents, pursuant to the co-primary allocation of the channels to the Basic Exchange Telecommunications Radio Service (BETRS) under Rule Sections 22.725 and 22.757. These BETRS operations further the Commission's universal service goals.

In short, a reallocation of these frequencies would unfairly and unwisely disrupt the provision of valuable communications services, and would at best, constitute another one of the fragmented, mismatched allocations to public safety which have

created the current predicament for these entities. See NPRM, supra at para. 14.

By Public Notice dated October 9, 1996, the Commission supplemented the NPRM in this proceeding to pose the question of whether the general principals articulated in Section 273(d)(4) of the Communications Act of 1934, as amended, may be useful in the development of future standards for public safety equipment. As a network carrier, Ameritech's parent corporation is concerned that public safety equipment be reliable and meet relevant interconnection standards. In this regard, the record in this proceeding should take note of the current work reflected in the standards being developed by the Telecommunications Industry Association (TIA), specifically, TR45.2. It is respectfully submitted that the public safety industry should be a part of the standards activity and should be heard in that forum if the development of interconnection standards is to meet their needs.

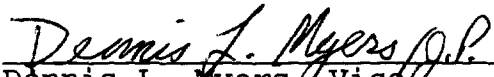
Conclusion

In light of the foregoing, it is respectfully submitted that the Commission should not disturb its present allocation of the VHF frequencies under Part 22.

Respectfully submitted,

AMERITECH MOBILE SERVICES, INC.

By


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Filed: October 21, 1996